Chief Compliance Officer Office of Enterprise Compliance March 16, 2011

Item 5a - Attachment 1

Board Assignment Status

Assignment Date	Request / Subject	Due Date	Status / Completed Date
Dec 2010	Allegation cases for Board Members and Executive staff should be investigated by an outside party.	TBD	Staff is researching and developing an escalation protocol to refer Ethics Helpline issues to an external party when deemed appropriate for external investigation or review.

Other Items of Interest

Item of Interest	Status / Completed Date	
Program Activities	 ECOM presented two sessions of Compliance and Ethics: Everyone's Responsibility in New Employee Orientation on March 2 and L.E.A.D.E.R. training on March 9. 	
	Ethics Helpline Monitor was hired, effective March 11.	
	Form 700 Coordinator was hired, effective March 2.	
Reporting Non-Compliance Issues	Ongoing	
Compliance Area Manager – Investments	 Global Equities and Fixed Income Compliance Area Managers (CAM) are monitoring investments daily and providing weekly summaries of compliance alerts to the Chief Compliance Officer. CAMs worked with INVO and LEGO on Investment policy reviews. 	
Compliance Area Manager – Health	CAM worked with Health business line to assess risk of non- compliance with policies, rules, and regulations.	
Compliance Area Manager – Pension	CAM worked with Pension business line to assess risk of non- compliance with policies, rules, and regulations.	